

1 Danielle E. Karst (D.C. Bar No. 481881)  
2 Timothy J. Mulreany (Maryland Bar No. 8812160123)  
3 **COMMODITY FUTURES TRADING COMMISSION**  
4 Three Lafayette Centre  
5 1155 21st Street, N.W.  
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7 **UNITED STATES DISTRICT COURT**  
8 **DISTRICT OF NEVADA**

9 **COMMODITY FUTURES TRADING**  
10 **COMMISSION,**

Case No. 2:19-cv-1697-JAD-DJA

11 Plaintiff,  
12 v.  
13 DAVID GILBERT SAFFRON  
14 a/k/a DAVID GILBERT and  
CIRCLE SOCIETY, CORP.,

15 **APPLICATION FOR ENTRY OF DEFAULT**  
**AGAINST DEFENDANT CIRCLE**  
**SOCIETY, CORP.**

16 Defendants.

17 **TO THE CLERK OF THE ABOVE-TITLED COURT:**

18 Plaintiff, Commodity Futures Trading Commission, respectfully requests that the Clerk  
19 enter default in this action pursuant to Federal Rule of Civil Procedure 55(a) against Circle  
20 Society, Corp. (“Defendant”), on grounds that the Defendant was duly served with the Summons  
21 and Complaint in this action but has failed to plead within the time prescribed by the Federal  
22 Rules of Civil Procedure. *See* Declaration of Danielle Karst in support of Plaintiff’s Application  
23 for Entry of Default Against Defendant Circle Society, submitted herewith.

1 Dated: November 4, 2019

Respectfully submitted,

2 By: /s/ Danielle E. Karst

3 Danielle E. Karst

4 Timothy J. Mulreany

5 **COMMODITY FUTURES TRADING**

6 **COMMISSION**

7 Three Lafayette Centre

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## **CERTIFICATE OF SERVICE**

On November 4, 2019, I served a copy of *Plaintiff's Application for Entry of Default Against Defendant Circle Society, Corp. and Declaration of Danielle Karst in Support of the Application* with the Clerk of the Court using the CM/ECF system. I also certify that on November 4, 2019, I sent hard copies of the same to Defendants David Gilbert Saffron and Circle Society, Corp. via United Parcel Service overnight mail at the following addresses:

## David Gilbert Saffron

Las Vegas, NV [REDACTED]  
*(Last-Known Address)*

## Circle Society, Corp.

c/o Michael C. Van, Esq.  
8985 S. Eastern Ave., Suite 100  
Las Vegas, NV 89123

**Circle Society, Corp.**  
c/o Registered Agent, Preston Sterling Kerr  
2450 Saint Rose Parkway, Suite 120  
Henderson, NV 89074

Date: November 4, 2019

/s/ Danielle E. Karst